

EXHIBIT C

AMERICAN ARBITRATION ASSOCIATION
CASE NO.: 01-23-0004-9691

INDIVIDUAL CLAIMANTS

Claimants,

v.

YAX ECOMMERCE LLC

Respondent.

MASS ARBITRATION

MOTION TO WITHDRAW AS COUNSEL

TO THE HONORABLE PANEL:

This *Motion for Withdrawal as Counsel* for Respondent Yax Ecommerce, LLC (“**Respondent**”) is brought by Elizabeth Revere (“**Ms. Revere**”) and the law firm of Lloyd & Mousilli, PLLC, (collectively, “**Movants**”). Ms. Revere is currently attorney of record for Respondent in the above-referenced matter. Movants ask that the Panel grant permission to withdraw as attorney for Respondent in this case. In support thereof, Movants respectfully show the Panel as follows:

I. INTRODUCTION

1. Abram Clark, Afshin Salehi, Anupam Bhatnagar, Brandon Young, Christopher Gross, Denis Betseu, Dominic Camany, Eduardo Calleja, Emmett Peter Adams, Isabel Ramos , James Berry, James Trammell Jr, Jameson Croney, Jana Mccoy, John Cundiff, John Neugebauer, John Vorgitch, Jordan Heinrichs, Julian Shores, Julie Whalen, Korey McAleesejergins, Kyle White, Michael Nibarger, Michael Whitten, Naba Mallick, Nicole Tilot, Olusegun Ososanya, Patrick Pfeiffer, Peter Robinson, Richard Colford, Kevin Youngman, Jennifer Baker, and Kameron Figueroa Claimants in this matter.

2. Wealth Assistants, LLC is the Respondent in this matter.
3. Movant, Ms. Revere, of Lloyd and Mousilli, PLLC, is counsel for Respondent.

II. BASIS FOR WITHDRAWAL

4. Good cause exists for the Panel to grant leave for Elizabeth Revere and the law firm of Lloyd & Mousilli, PLLC to withdraw as attorney and firm of record for Respondents. Irreconcilable differences have arisen between Respondent and Movants. As a result, Movants are no longer able to represent Respondent and must withdraw as counsel. Wealth Assistants has informed Ms. Revere and the firm that it is retaining other counsel.
5. The last known address of Respondent Wealth Assistants is 1334 Brittmoore Rd. Suite 1001 Houston, TX 77043
6. A conference is scheduled for October 22, 2024 at 1:00 p.m. CT.
7. This case is currently stayed.
8. This Motion is not sought for the purposes of delay.
9. The withdrawal of Movants will not delay these proceedings.

III. NOTICE TO CLIENT

10. Pursuant to Rule 10 of the Texas Rules of Civil Procedure, Movants hereby give notice to Respondent of the right to object to this Motion. If Respondent does not oppose the withdrawal of Elizabeth Revere and the law firm of Lloyd & Mousilli, PLLC as your attorneys, Respondent may notify Movants in writing of consent to this Motion.

IV. PRAYER

WHEREFORE, PREMISES CONSIDERED, Movants request that the Panel grant their Motion for Withdrawal of Counsel, enter an order discharging Movants as attorney and firm of

record for Respondents and relieving Movants from any further responsibility in the representation of Respondent; and for such other and further relief, both general and special, at law or in equity, to which they may show themselves to be justly entitled.

Dated: October 21, 2024

Respectfully submitted,

By: /s/ Elizabeth Revere

ELIZABETH REVERE

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**ATTORNEYS FOR RESPONDENTS
WEALTH ASSISTANTS AND RYAN
CARROLL**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document, and any attachments, will be served to counsel of record, in accordance with the governing rules of procedure regarding service on this **October 21, 2024**, via *electronic mail* as follows:

Nico Banks, Esq.
Banks Law Office, P.C.
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712 H St NE,
Unit #8571,
Washington, DC 20002

/s/ Elizabeth Revere

ELIZABETH REVERE